

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,

-against-

**ABEDNEGO GONZALEZ,
a/k/a "Junior".**

MOTION TO WITHDRAW

08cr270 (LAK)

Defendants.

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PLEASE TAKE NOTICE, that, upon the annexed affirmation of Ramon A. Pagan, the law firm of Pagan & Pagan, prior counsel to the defendant in the above-referenced matter, hereby moves this Court, at a date and time to be set by the Court, for an order relieving Pagan & Pagan as counsel of record, and substituting the law firm of Patrick J. Brackley, Esq. as counsel of record.

Dated: Bronx, New York
June 26, 2008

RAP

Ramon A. Pagan (RP7661)
Pagan & Pagan
2116 Williamsbridge Road
Bronx, New York 10461
(718) 993-1598

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,

-against-

**ABEDNEGO GONZALEZ,
a/k/a "Junior".**

Defendants.

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AFFIRMATION

08cr270 (LAK)

RAMON A. PAGAN, an attorney duly admitted to practice before this Court and the courts of the State of New York, does hereby state under penalty of perjury:

1. I am a partner at the law firm Pagan & Pagan, I submit this affirmation upon information and belief and my review of the case-file in this matter.
2. Upon the request of the Court we are submitting this motion to withdraw as counsel and to be substituted as counsel by Patrick J. Brackley, Esq.
3. Upon information and belief, upon the filing of the notice of appearance by Mr. Brackley in this case, the Assistant United States Attorney provided a copy of the case file that existed to that point, to Mr. Brackley.
4. Further, on June 18, 2008, Mr. Brackley requested that we make this motion and that we provide him with a copy of the case-file that we have in our possession.
5. We are in the process of having the file copied and delivered to Mr. Brackley at this moment. We believe he will be in possession of the file early next week, to allow for copying and delivery.

WHEREFORE, we respectfully request that the Court grant the motion and any other further relief the Court deems just and proper.

Dated: Bronx, New York
June 18, 2008

Respectfully submitted,

RAP

Ramon A. Pagan (RP7661)
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